

REMARKS

Claims 1-25, all the claims pending in the application, stand rejected on prior art grounds. Applicants respectfully traverse these rejections based on the following discussion.

I. The Prior Art Rejections

Claims 1-25 stand rejected under 35 U.S.C. §102(e) as being anticipated by Abbott, et al. (U.S. Publication No. 2004/0236641), hereinafter referred to as Abbott. Applicants respectfully traverse these rejections based on the following discussion.

The claimed invention provides a method of forecasting component requirements for devices being manufactured. In the rejection, the Office Action argues that Abbott discloses determining production quantities of devices planned to be manufactured and multiplying first level component volumes for each device by a corresponding production quantity of said production quantities to determine a total volume of first level components required. In addition, the Office Action asserts that Abbott discloses calculating a volume of each critical component and critical assembly component required to manufacture said devices based on said total volume and providing a total volume of assembly components required to assembly component manufacturers. However, Abbott teaches a method of de-manufacturing machines to harvest their individual parts - not a method of manufacturing the machines from the parts. Nothing within Abbott teaches calculating a volume of critical parts required to manufacture machines. This is because machines are not manufactured in Abbott; rather, machines are de-manufactured, or dismantled, so that their parts may be harvested to satisfy a parts supply demand. Therefore,

as explained in greater detail below, Applicants respectfully submit that the prior art of record does not teach or suggest the claimed invention.

The Office Action argues that Abbott discloses determining *production quantities* of devices planned to be manufactured (Office Action, bottom of p. 2). Additionally, the Office Action argues that Abbott discloses multiplying first level component volumes for each device by a corresponding *production quantity of said production quantities* to determine a total volume of first level components required (Office Action, bottom of p. 2 – top of p. 3).

In support for these arguments, the Office Action cites paragraphs 0015-0018 of Abbott, which discloses “dismantling” or “de-manufacturing” machines for their individual parts. More specifically, as discussed in paragraph 0002 of Abbott, businesses typically lease high cost equipment rather than purchasing the equipment outright. When equipment is leased from a manufacturer, however, it may be more profitable for the manufacturer to break down, or de-manufacture, machinery and sell the individual parts of the machine separately. Thus, the first sentence of the detailed description states that “a system and method for optimizing a machine supply to meet a predetermined *parts demand* at a lowest cost is provided” (Abbott, para. 0015 (emphasis added)).

Therefore, Abbott teaches a method of de-manufacturing machines to harvest their individual parts - not a method of manufacturing the machines from the parts. The portions cited by the Office Action (i.e., para. 0015-0018) further disclose an example of such a de-manufacturing process. To meet the demand for part x, one A machine and two B machines can be dismantled to yield the demanded 9 parts at a cost of \$700. This would also yield 11 z parts, which is sufficient to meet the demand for part z of 10 units. Alternatively, five B machines can

be dismantled to yield ten x parts and twenty z parts at a cost of \$750. Lastly, four A machines will yield 20 x parts and 12 z parts at a dismantling cost of \$1,600. The first solution is the most cost effective at \$700, and therefore, is selected as the optimal dismantling configuration (the type and number of machines to dismantle to meet parts demand at the lowest cost) of the machine supply.

Therefore, Abbott teaches away from the claimed invention. Specifically, Abbott is directed towards a method of dismantling machines to harvest individual parts, wherein the individual parts from the dismantled machines are sold to meet a parts demand. Thus, Abbott teaches away from manufacturing devices from parts.

Accordingly, it is Applicants' position that Abbott fails to teach the claimed feature of a "method of forecasting component requirements for devices being manufactured, said method comprising: determining production quantities of said devices planned to be manufactured" as defined by independent claims 1, 8, 13, and 19. Furthermore, Abbott fails to teach the claimed feature of "multiplying first level component volumes for each device by a corresponding production quantity of said production quantities to determine a total volume of first level components required" as defined by independent claims 1, 8, 13, and 19.

In addition, the Office Action asserts that Abbott discloses calculating a volume of each critical component and critical assembly component required to manufacture said devices based on said total volume (Office Action, bottom of p. 5 (citing Abbott, para. 0047 – 0049)) and providing a total volume of assembly components required to assembly component manufacturers (Office Action, middle of p. 3 (citing Abbott, para. 0015 – 0018)).

Once more, the portions cited by the Office Action discuss “dismantling” or “de-manufacturing” machines for its individual parts. Specifically, paragraphs 0047 – 0049 of Abbott discuss the high level data and processing flow illustrated in FIG. 2. Abbott provides an optimization tool that calculates the optimal dismantling configuration (step 58) to generate a list of machines to dismantle 60. The system also determines whether purchasing machines to dismantle will meet the parts demand at a lower cost to produce a greater profit than dismantling existing stock 62, generating a report of suggested machines to buy for dismantling 64.

Nothing within Abbott, including the portions cited by the Office Action, teaches calculating a volume of critical parts *required to manufacture* machines. This is because machines are not manufactured in Abbott; rather, machines are de-manufactured, or dismantled, so that their parts may be harvested to satisfy a parts supply demand. Therefore, it is Applicants’ position that Abbott fails to teach the claimed feature of “calculating a volume of each critical component and critical assembly component required to manufacture said devices” as defined in independent claim 8.

Applicants further submit that nothing within Abbott, including the portions cited by the Office Action, teaches providing the total number of parts *required* (to build machines) to *part manufacturers*. Rather, Abbott teaches providing the number of parts *harvested* (from machine de-manufacturing) to *part buyers*. Again, this is because machines are not manufactured in Abbott; rather, machines are de-manufactured, or dismantled, so that their parts may be harvested to satisfy a parts supply demand. In other words, because machines are not produced in Abbott, manufacturers of parts are not provided with a number of parts required. Instead,

machines are dismantled in Abbott; and as such, the number of parts harvested from the dismantling is provided to parts buyers. Therefore, it is Applicants' position that Abbott fails to teach the claimed feature of "providing said total volume of assembly components required to assembly component manufacturers" as defined in independent claims 1 and 19.

Therefore, it is Applicants' position that Abbott does not teach many features defined by independent claims 1, 8, 13, and 19 and that such claims are patentable over the prior art of record. Further, it is Applicants' position that dependent claims 2-7, 9-12, 14-18, and 20-25 are similarly patentable, not only because of their dependency from a patentable independent claims, but also because of the additional features of the invention they defined. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the rejections.

II. Formal Matters and Conclusion

In view of the foregoing, Applicants submit that claims 1-25, all the claims presently pending in the application, are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to

discuss any other changes deemed necessary. Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 50-0510.

Respectfully submitted,

Dated:

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